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July 8, 2021

**VIA ECF**

Hon. Alison Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 906  
New York, NY 10007

Re: *Campbell, et. al. v. City of New York*, Case No. 1:16-cv-08719-AJN

Dear Judge Nathan:

I write on behalf of both parties to inform you that after several months of settlement negotiations, counsel for the parties have reached a settlement in principle and will be seeking final approval from our clients. In light of this settlement, the parties respectfully request a 30-day adjournment of the pre-trial filing deadlines in this matter to August 12, 2021. Dkt. 173. This is the first request for an adjournment of these deadlines.

Upon approval by the clients, the parties will draft a settlement agreement, and once finalized, we will seek settlement approval from the Court through the submission of a motion pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. 2015). Counsel for the parties have resolved similar FLSA matters in the past and do not anticipate disputes in connection with drafting a settlement agreement and believe that 30 days is sufficient to obtain the necessary approval, prepare a written settlement agreement, and submit a joint settlement approval motion pursuant to *Cheeks*.

Thank you for your attention.

Sincerely,

McGILLIVARY STEELE ELKIN LLP

David Ricksecker

cc: All Counsel (via ECF)